

JCPenney

June 17, 1993

5984

UPS OVERNITE MAIL

Kevin Turner
Remedial Project Manager
U.S. Environmental Protection Agency
HSRM -6J
77 W. Jackson Blvd.
Chicago, Illinois 60604

Re: **Section 104 (e) of CERCLA for the Sanitary Landfill
Company (IWD) Site in Moraine, Ohio ("Site")**

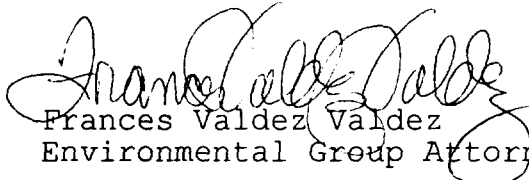
Dear Mr. Turner:

I am responding to Lynn Peterson's, Chief of Solid Waste and Emergency Response Branch, letter dated May 24, 1993 concerning the above-referenced Site.

J.C. Penney Company, Inc. ("Penney") requests an extension of time until July 30, 1993 to respond to the request for information about Penney's possible involvement with the Site. This additional time is necessary because of the scope of the information requested, the remoteness of the time period involved and Penney's corporate record retention policy.

Penney discontinued operating its automotive centers ("TBAs") in 1983. The TBAs are the only likely source of waste, consisting of batteries and waste oil, that may have been processed or disposed of at the Site. The managers and personnel employed at the TBAs in the Ohio area are no longer associated with Penney. Moreover, in accordance with normal record retention policy, all TBA receipts and invoices would have been discarded after three years and personnel records after seven years. As a result, Penney's records, if any, relating to the Site and originating around 1975 would have been discarded either in 1978 and/or 1984. Accordingly, Penney requests this extension to gather the information necessary to prepare a response to the 104 (e) Request.

Very truly yours,


Frances Valdez Valdez
Environmental Group Attorney

Y:\4000d\valdez\epaextension.104

Legal Department J. C. Penney Company, Inc. 6501 Legacy Drive, Plano, Texas 75024-3698
Mailing Address: P. O. Box 10001, Dallas, Texas 75301-0001 Tel: (214) 431-1000
Telex: Domestic 62800132 Legal JCP UD, International 595553 Legal JCP UD Fax: (214) 431-1133/4

Recycled Paper